

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MONIQUE RUSSELL, JASMINE RIGGINS,
ELSA M. POWELL, and DESIRE EVANS,

Plaintiffs,

v.

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES,

Defendant.

Civil Action No. 18-5629

Honorable Joshua D. Wolson

**DEFENDANT’S MOTION TO EXCLUDE THE OPINIONS AND ANTICIPATED
TESTIMONY OF PLAINTIFFS’ EXPERT DR. ANNIE STEINBERG**

For the reasons set forth in the attached memorandum of law, Defendant Educational Commission for Foreign Medical Graduates, by and through its undersigned counsel, moves to exclude the opinions and anticipated testimony of Plaintiffs’ expert Dr. Annie Steinberg pursuant to Federal Rules of Evidence 702, 703, and 403, and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993).

Dated: December 10, 2021

Respectfully submitted,

/s/ Brian W. Shaffer

Brian W. Shaffer, PA Bar No. 78851
Elisa P. McEnroe, PA Bar No. 206143
Matthew D. Klayman, PA Bar No. 319105
MORGAN, LEWIS & BOCKIUS, LLP
1701 Market Street
Philadelphia, PA 19103-2921
Telephone: +1.215.963.5000
Facsimile: +1.215.963.5001
brian.shaffer@morganlewis.com
elisa.mcenroe@morganlewis.com
matthew.klayman@morganlewis.com

*Attorneys for the Educational Commission for
Foreign Medical Graduates*

CERTIFICATE OF SERVICE

I do hereby certify that on this date, I caused true and correct copies of the foregoing document to be served via electronic filing upon all counsel of record via the ECF system and/or e-mail.

DATED: December 10, 2021

/s/ *Brian W. Shaffer*

Brian W. Shaffer